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9 THOMAS SAYLOR

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case No. 2:23-cv-03447 MRA (MARx)

**DECLARATION OF RUSSELL
GOMM IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION IN
LIMINE NO. 3**

(Filed concurrently with Plaintiff's
Opposition to Defendant's Motion in
Limine No. 3)

DECLARATION OF RUSSELL GOMM

20 I, Russell Gomm, hereby declare as follows:

21 1. I am counsel of record for plaintiff Thomas Saylor
22 ("Plaintiff") in this matter. I have personal knowledge of the facts set forth
23 herein and, if sworn as a witness, could and would testify competently
24 thereto.

1 2. Attached hereto as Exhibit A is a true and correct copy of
2 documents Bates numbered SAYLOR000142–312 that were produced to
3 counsel for Defendant in this matter on October 30, 2023. These
4 documents comprise income statements from Plaintiff's self-employment
5 with Lyft and Uber from May 2023 to October 2023.

6 3. Attached hereto as Exhibit B is a true and correct copy of
7 documents Bates numbered SAYLOR000470–868 that were produced to
8 counsel for Defendant in this matter on September 3, 2024. These
9 documents comprise income statements from Plaintiff's self-employment
10 with Lyft and Uber from October 2023 to September 2024.

11 4. Attached hereto as Exhibit C is a true and correct copy of
12 documents Bates numbered SAYLOR000869–870 that were produced to
13 counsel for Defendant in this matter on September 10, 2024. These
14 documents are photos of the ship that Plaintiff worked on, from
15 Defendant's public website at "[https://www.guiceoffshore.com/fleet/
go-quest/](https://www.guiceoffshore.com/fleet/go-quest/)."

17 5. Attached hereto as Exhibit D is a true and correct copy of a
18 document Bates numbered SAYLOR000871 that was produced to
19 counsel for Defendant in this matter on September 10, 2024. This
20 document is a photo of the ship that Plaintiff worked on, from the public
21 website "<https://space-offshore.com/go-quest/>."

22 6. Attached hereto as Exhibit E is a true and correct copy of a
23 document Bates numbered SAYLOR000872 that was produced to
24 counsel for Defendant in this matter on September 10, 2024. This
25 document is a photo of the ship that Plaintiff worked on, from the public

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1 website “<https://x.com/SpaceOffshore/status/1444397382003793927>/
2 photo/1.”

3 I declare under the laws of the United States that the foregoing is
4 true and correct.

5 Dated: September 26, 2024

/s/ Russell Gomm

Russell Gomm

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